

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:

ELIZABETH SPARROW

CASE NO. 12-42354

DEBTOR

CHAPTER 13

DEBTOR'S OBJECTION TO CLAIM NUMBER 3

NO HEARING WILL BE CONDUCTED ON THIS MOTION/OBJECTION/APPLICATION UNLESS A WRITTEN OBJECTION OR REQUEST FOR HEARING IS FILED WITH THE UNITED STATES BANKRUPTCY CLERK, WELLS FARGO BANK BUILDING, 660 N. CENTRAL EXPRESSWAY, #300B, PLANO, TX 750749795, AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF THE FILING OF THIS MOTION, UNLESS THE COURT, SUA SPONTE, OR UPON TIMELY APPLICATION OF A PARTY IN INTEREST, SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION OR REQUEST FOR HEARING

IN NO OBJECTION OR REQUEST FOR HEARING IS TIMELY FILED AND SERVED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. IF YOU FAIL TO APPEAR AT THE HEARING, YOUR OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET ANY MATTER FOR HEARING.

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES DEBTOR ELIZABETH SPARROW (hereinafter "Debtor") by and through her counsel of record and files this Objection to Claim Number 3 filed by InSolve Recovery, LLC pursuant to Rule 3007 of the Bankruptcy Rules of Civil Procedure and in support thereof respectfully would show the Court the following:

- 1.01** On August 30, 2012 the Debtor filed a voluntary petition under chapter 13 of the Bankruptcy Code.
- 1.02** The non-governmental claims bar date ended on January 9, 2013.
- 1.03** On November 27, 2012, InSolve Recovery, LLC filed a "Proof of Claim," claim number 3 in the amount of \$22,103.94. *See* Exhibit A.
- 1.04** The Debtor asserts that such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law for a reason other than because such claim is contingent or unmatured.
- 1.05** The Debtor also asserts that she does not recognize Creditor as a Creditor to whom she owes money.
- 1.06** The Debtor also asserts that the "UNSECURED" claim is not listed on Debtor's bankruptcy schedules.
- 1.07** The Debtor also asserts that she does not believe that she should be required to pay Creditor because she believes that she does not owe Creditor any money.

WHEREFORE, PREMISES CONSIDERED, Debtor prays that the Court DISALLOW Claim Number 3 and for such other and further relief to which Debtor may show itself justly entitled.

Respectfully submitted,

THE HOPPING LAW GROUP, PC

_____/s/ John Hopping _____

JOHN HOPPING

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ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served via electronic means as noted on the Court's ECF noticing system or by regular first class mail on the 17th day of July, 2013 to the parties listed on the attached court's matrix and the following:

InSolve Recovery, LLC, c/o Capital Recovery Group, LLC
Dept 3203
PO BOX 123203
DALLAS, TX 75312-3203

_____/s/ John Hopping _____
John Hopping